

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

R.S. BASSMAN, Derivatively on Behalf of FREDDIE MAC a/k/a Federal Home Loan Mortgage Corporation and its shareholders,

Plaintiff,

V.

RICHARD F. SYRON, PATRICIA L. COOK,  
ANTHONY S. PISZEL, EUGENE M. McQUADE,  
RICHARD KARL GOELTZ, STEPHEN A. ROSS,  
SHAUN F. O'MALLEY, ROBERT R. GLAUBER,  
BARBARA T. ALEXANDER, WILLIAM M.  
LEWIS, JR., JEFFREY M. PEEK, GEOFFREY T.  
BOISI, RONALD F. POE, WASHINGTON  
MUTUAL, INC., PRICEWATERHOUSECOOPERS,  
LLP, KERRY K. KILLINGER, ANTHONY R.  
MERLO, JR., FIRST AMERICAN CORPORATION,  
FIRST AMERICAN EAPPRAISEIT,  
COUNTRYWIDE FINANCIAL CORPORATION,  
COUNTRYWIDE HOME EQUITY LOAN TRUST,  
COUNTRY-WIDE BANK, FSB, COUNTRYWIDE  
HOME LOANS, INC., LANDSAFE, INC., and  
ANGELO R. MOZILO

### Defendants.

and

FREDDIE MAC a/k/a Federal Home Loan Mortgage Corporation,

### Nominal Defendant

**NOTICE OF ASSENTED-TO  
MOTION FOR ADMISSION  
*PRO HAC VICE***

PLEASE TAKE NOTICE that, upon the Affidavit of Jeffrey A. Simes, submitted herewith, the undersigned respectfully moves this Court for an Order pursuant to Rule 1.3(c) of the Local Rules of this Court, admitting Brian E. Pastuszenski, Esq., Stuart M. Glass, Esq., and Stacey S. Baron, Esq. *pro hac vice* to the Bar of this Court for the purpose of representing Defendants Countrywide Financial Corporation, Countrywide Home Equity Loan Trust,

Countrywide Bank, FSB, Countrywide Home Loans, Inc., Landsafe, Inc., and Angelo R. Mozilo, in the above-captioned proceeding. The plaintiff has assented to the relief requested in this motion.

Dated: June 24, 2008

Respectfully submitted,

**COUNTRYWIDE FINANCIAL  
CORPORATION, COUNTRYWIDE HOME  
EQUITY LOAN TRUST, COUNTRYWIDE  
BANK FSB, COUNTRYWIDE HOME  
LOANS, INC., LANDSAFE, INC., and  
ANGELO R. MOZILO**

By their attorneys,



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Jeffrey A. Simes (JS-7060)  
jsimes@goodwinprocter.com  
GOODWIN PROCTER LLP  
The New York Times Building  
620 Eighth Avenue  
New York, NY 10018-1405  
Tel. (212) 813-8800

Brian E. Pastuszenski  
bpastuszenski@goodwinprocter.com  
Stuart M. Glass  
sglass@goodwinprocter.com  
Stacey S. Baron  
sbaron@goodwinprocter.com  
GOODWIN PROCTER LLP  
53 State Street  
Boston, MA 02110  
Tel. (617) 570-1000

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

R.S. BASSMAN, Derivatively on Behalf of FREDDIE ) ECF CASE  
MAC a/k/a Federal Home Loan Mortgage Corporation )  
and its shareholders, )  
Plaintiff, )  
v. ) Case No. 08-CV-02423 (BSJ) (JCF)

RICHARD F. SYRON, PATRICIA L. COOK, )  
ANTHONY S. PISZEL, EUGENE M. McQUADE, )  
RICHARD KARL GOELTZ, STEPHEN A. ROSS, )  
SHAUN F. O'MALLEY, ROBERT R. GLAUBER, )  
BARBARA T. ALEXANDER, WILLIAM M. LEWIS, )  
JR., JEFFREY M. PEEK, GEOFFREY T. BOISI, )  
RONALD F. POE, WASHINGTON MUTUAL, INC., )  
PRICEWATERHOUSECOOPERS, LLP, KERRY K. )  
KILLINGER, ANTHONY R. MERLO, JR., FIRST )  
AMERICAN CORPORATION, FIRST AMERICAN )  
EAPPRAISEIT, COUNTRYWIDE FINANCIAL )  
CORPORATION, COUNTRYWIDE HOME )  
EQUITY LOAN TRUST, COUNTRY-WIDE BANK, )  
FSB, COUNTRYWIDE HOME LOANS, INC., )  
LANDSAFE, INC., and ANGELO R. MOZILO )

Defendants, )

and )  
FREDDIE MAC a/k/a Federal Home Loan Mortgage )  
Corporation, )

Nominal Defendant. )

**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK )  
ss.:  
COUNTY OF NEW YORK )

Alexis D. Fernandez, being duly sworn, deposes and says that he is not a party to the within action, is over 21 years of age and resides in New York, New York.

That on the 24<sup>th</sup> day of June, 2008, deponent caused the annexed Notice of Assented-To Motion for Admission Pro Hac Vice, to be served by first class mail, postage prepaid, by

depositing true copies of the same securely enclosed in postpaid wrappers, directed to the following counsel of record:

Daniel P. Chiplock  
Steven E. Fineman  
Lieff, Cabraser, Heimann  
& Bernstein, LLP  
780 Third Avenue, 48<sup>th</sup> Floor  
New York, New York 10017

Richard D. Greenfield  
Greenfield & Goodman, LLC  
780 Third Avenue  
New York, NY 10017

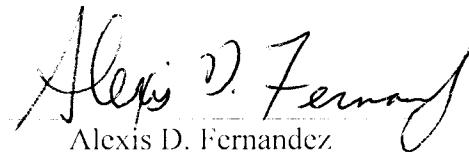
Diana L. Weiss  
Joshua M. Cutler  
Orrick, Herrington & Sutcliffe,  
LLP  
Columbia Center  
1152 15<sup>th</sup> Street, N.W.  
Washington, DC 20005

Kenneth I. Scacter  
Bingham McCutchen LLP  
399 Park Avenue  
New York, NY 10022

David W. Stanley  
Jonathan W. Cuneo  
Cueno, Waldman & Gilbert, LLP  
507 C Street, NE  
Washington, DC 20002

Robert J. Cynkar  
Shaw, Pittman, Potts & Trowbridge  
2300 N Street, N.W.  
Washington, DC 20002

Patrick J. Smith  
Richard F. Hans, Jr.  
Thacher Proffitt & Wood, LLP  
Two World Financial Center  
New York, NY 10281



Alexis D. Fernandez

Sworn to before me this  
21 day of June, 2008.



Notary Public

**JACK GROARKE**  
**NOTARY PUBLIC, STATE OF NEW YORK**  
NO. 01GR6174713  
QUALIFIED IN NEW YORK COUNTY  
COMMISSION EXPIRES 09/24/2011

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

R.S. BASSMAN, Derivatively on Behalf of FREDDIE  
MAC a/k/a Federal Home Loan Mortgage Corporation ) ECF CASE  
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Plaintiff, )  
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COUNTRY-WIDE BANK, FSB, COUNTRYWIDE )  
HOME LOANS, INC., LANDSAFE, INC., and )  
ANGELO R. MOZILO )  
Defendants, )  
and )  
FREDDIE MAC a/k/a Federal Home Loan Mortgage )  
Corporation, )  
Nominal Defendant. )  
**AFFIDAVIT OF JEFFREY A.  
SIMES IN SUPPORT OF  
ASSENTED-TO MOTION FOR  
ADMISSION *PRO HAC VICE***

STATE OF NEW YORK )  
 ) SS.  
COUNTY OF NEW YORK )

Jeffrey A. Simes, being duly sworn, deposes and says:

1. I am a partner with the firm of Goodwin Procter LLP, attorneys for Defendants  
Countrywide Financial Corporation, Countrywide Home Equity Loan Trust, Countrywide Bank,

FSB, Landsafe, Inc., and Angelo R. Mozilo in the above-captioned proceeding and a member in good standing of the Bar of this Court since 1997. I make this Affidavit In Support of the Motion, pursuant to Rule 1.3(c) of the Local Rules of this Court, for admission of Brian E. Pastuszenski, Esq., Stuart M. Glass, Esq., and Stacey S. Baron, Esq. to the Bar of this Court *pro hac vice*.

2. Mr. Pastuszenski is a partner with the firm of Goodwin Procter LLP, Exchange Place, 53 State Street, Boston, MA 02109. He is a member in good standing of the Bar of the Commonwealth of Massachusetts. Mr. Pastuszenski is also admitted to practice in the United States Supreme Court, the United States Court of Appeals for the First Circuit, the United States District Courts for the Districts of Massachusetts, Colorado, and Michigan (Eastern District), the United States Tax Court and the United States Bankruptcy Court for the District of Massachusetts. Attached hereto as Exhibit 1 is a Certificate from the Supreme Judicial Court of the Commonwealth of Massachusetts stating that Mr. Pastuszenski is a member in good standing of the Bar of the Commonwealth of Massachusetts. Mr. Pastuszenski is familiar with the Federal Rules of Civil Procedure, the Federal Rules of Evidence and the Rules of this Court.

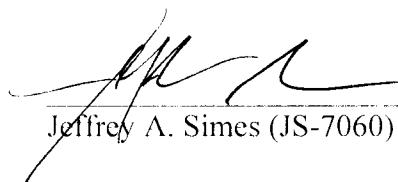
3. Mr. Glass is a partner with the firm of Goodwin Procter LLP, Exchange Place, 53 State Street, Boston, MA 02109. He is a member in good standing of the Bar of the Commonwealth of Massachusetts. Mr. Glass is also admitted to practice in the United States Courts of Appeals for the First and Second Circuits, and the United States District Courts for the Districts of Massachusetts and Colorado. Attached hereto as Exhibit 2 is a Certificate from the Supreme Judicial Court of the Commonwealth of Massachusetts stating that Mr. Glass is a member in good standing of the Bar of the Commonwealth of Massachusetts. Mr. Glass is familiar with the Federal Rules of Civil Procedure, the Federal Rules of Evidence and the Rules

of this Court.

4. Ms. Baron is an associate with the firm of Goodwin Procter LLP, Exchange Place, 53 State Street, Boston, MA 02109. She is a member in good standing of the Bar of the Commonwealth of Massachusetts. Ms. Baron is also admitted to practice in the United States District Court for the District of Massachusetts. Attached hereto as Exhibit 3 is a Certificate from the Supreme Judicial Court of the Commonwealth of Massachusetts stating that Ms. Baron is a member in good standing of the Bar of the Commonwealth of Massachusetts. Ms. Baron is familiar with the Federal Rules of Civil Procedure, the Federal Rules of Evidence and the Rules of this Court.

5. Plaintiff has assented to this motion.

6. Accordingly, I respectfully request that Messrs. Pastuszenski and Glass and Ms. Baron be admitted to the Bar of this Court *pro hac vice* for the purposes of representing Defendants Countrywide Financial Corporation, Countrywide Home Equity Loan Trust, Countrywide Bank, FSB, Countrywide Home Loans, Inc., Landsafe, Inc., and Angelo R. Mozilo in the above-captioned proceeding.



Jeffrey A. Simes (JS-7060)

Sworn to before me this 21 day  
of June, 2008.



Notary Public  
My Commission expires:

**JACK GROARKE**  
NOTARY PUBLIC, STATE OF NEW YORK  
NO. 01L-P6174713  
QUALIFIED IN NEW YORK COUNTY  
COMMISSION EXPIRES 08/24/2011

**COMMONWEALTH OF MASSACHUSETTS**

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston  
within and for said County of Suffolk, on the **eighteenth**  
day of **December** A.D. **1981**, said Court being the highest  
Court of Record in said Commonwealth:

**Brian E. Pastuszenski**

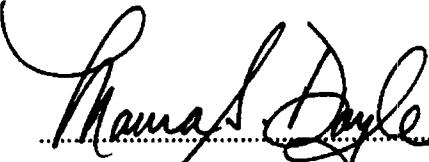
being found duly qualified in that behalf, and having taken and subscribed  
the oaths required by law, was admitted to practice as an Attorney, and, by  
virtue thereof, as a Counsellor at Law, in any of the Courts of the said  
Commonwealth: that said Attorney is at present a member of the Bar, and  
is in good standing according to the records of this Court\*.

In testimony whereof, I have hereunto set my hand and affixed the

seal of said Court, this **eighteenth** day of **June**

in the year of our Lord **two thousand and eight**.



  
**MAURA S. DOYLE, Clerk**

\* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

**COMMONWEALTH OF MASSACHUSETTS**

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston  
within and for said County of Suffolk, on the **fourteenth**  
day of **December** A.D. **1998**, said Court being the highest  
Court of Record in said Commonwealth:

**Stuart Marc Glass**

being found duly qualified in that behalf, and having taken and subscribed  
the oaths required by law, was admitted to practice as an Attorney, and, by  
virtue thereof, as a Counsellor at Law, in any of the Courts of the said  
Commonwealth: that said Attorney is at present a member of the Bar, and  
is in good standing according to the records of this Court\*.

In testimony whereof, I have hereunto set my hand and affixed the

seal of said Court, this **eighteenth** day of **June**

in the year of our Lord **two thousand and eight**.



  
**MAURA S. DOYLE, Clerk**

\* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

**COMMONWEALTH OF MASSACHUSETTS**

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston  
within and for said County of Suffolk, on the **twenty-eighth**  
day of **November** A.D. **2005**, said Court being the highest  
Court of Record in said Commonwealth:

**Stacey S. Baron**

being found duly qualified in that behalf, and having taken and subscribed  
the oaths required by law, was admitted to practice as an Attorney, and, by  
virtue thereof, as a Counsellor at Law, in any of the Courts of the said  
Commonwealth: that said Attorney is at present a member of the Bar, and  
is in good standing according to the records of this Court\*.

In testimony whereof, I have hereunto set my hand and affixed the  
seal of said Court, this **eighteenth** day of **June**  
in the year of our Lord **two thousand and eight**.



A handwritten signature in black ink, appearing to read "Maury S. Doyle".  
**MAURA S. DOYLE, Clerk**

\* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MAC a/k/a Federal Home Loan Mortgage Corporation ) ECF CASE  
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HOME LOANS, INC., LANDSAFE, INC., and )  
ANGELO R. MOZILO )  
Defendants, )  
and )  
FREDDIE MAC a/k/a Federal Home Loan Mortgage )  
Corporation, )  
Nominal Defendant. )  
[PROPOSED] ORDER  
ADMITTING COUNSEL PRO  
HAC VICE

**[PROPOSED] ORDER  
ADMITTING COUNSEL *PRO  
HAC VICE***

Upon consideration of the Assented-To Notice of Motion for Admission *Pro Hac Vice* of Brian E. Pastuszynski, Esq., Stuart M. Glass, Esq., and Stacey S. Baron, Esq., dated June 19, 2008, and the accompanying Affidavit of Jeffrey A. Simes, Esq., sworn to on June 19, 2008, it is hereby:

**ORDERED** that, pursuant to Local Civil Rule 1.3(c) of the Local Rules of this Court,

Brian E. Pastuszenski, Esq., Stuart M. Glass, Esq., and Stacey S. Baron, Esq. are hereby admitted *pro hac vice* to the Bar of this Court for the purpose of representing Defendants Countrywide Financial Corporation, Countrywide Home Equity Loan Trust, Countrywide Bank, FSB, Countrywide Home Loans, Inc., Landsafe, Inc., and Angelo R. Mozilo in the above-captioned proceeding.

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James C. Francis,  
United States Magistrate Judge

Dated: \_\_\_\_\_, 2008